

EXHIBIT R

DECLARATION OF AIPI, LLC CUSTODIAN OF RECORDS

I, Eric Morehouse, hereby declare under penalty of perjury:

1. I am over the age of 18 years old, and I am competent in all respects to testify to the matters herein. I am a member and manager of AiPi, LLC (“AiPi”), and as such, I have authority to execute this declaration on behalf of AiPi as to the records and authenticity of documents produced by AiPi in response to Netflix’s subpoena.

2. AiPi’s business records are stored locally on a computer in my possession. AiPi maintains a computer file on Mr. Valjakka’s lawsuit against Netflix (“Netflix File”). This file contains the documents AiPi has relating to Mr. Valjakka’s lawsuit against Netflix. In addition, I saved emails relevant to Mr. Valjakka’s lawsuit against Netflix within this folder.

3. In response to the subpoena issued by Netflix, I conducted a search for documents and emails responsive to the six topics by reviewing each of the documents contained within the Netflix folder. I categorized the documents as they pertained to the six topics in the subpoena. In addition to this search, I also searched all of the emails from William Ramey relating to “Netflix.” All of these emails containing the term “Netflix” were produced or logged as privileged. I searched for the term “Netflix” because this search term would necessarily encompass the subtopics listed within topic 4. I also separately searched for “CDN” as it pertained to topic 2 and topic 4(e).

4. After receiving the letter from Netflix claiming that the production was incomplete, I have undertaken to conduct a second search for responsive documents. With respect to this search, I am doing the following:

- a. AiPi previously produced the subscription agreement with its investors. I will search to locate the signature page for each investor to the subscription agreement.

- b. AiPi has produced all documents containing “CDN.” Nonetheless, I will re-search “CDN” to confirm that there are no additional documents.
- c. AiPi has produced all investor presentations concerning Valjakka’s litigation. Nonetheless, I will search again to confirm that there are no additional documents.
- d. I will conduct another search of my email, for emails sent from Mr. Ramey. I will also search for emails sent to Mr. Ramey. The terms I will search include “Netflix” and “Valjakka.”
- e. My initial search of emails from Erick Robinson was limited to those emails contained within the Netflix Folder. I will conduct a search within my email for emails to and from Mr. Robinson containing the terms “Netflix” and “Valjakka.”
- f. AiPi produced all documents concerning the risk of attorney fees to be awarded against Valjakka. I searched for all documents contained within the Netflix folder. I was also the primary contact person from AiPi regarding the Valjakka litigation and I am not aware, or have any recollection, of any communications other than AIPi_Privilege000001-000005.
- g. AiPi produced communications concerning payments of the settlement proceeds from Valjakka’s litigation. I understand that Netflix also is seeking bank/wire confirmations. I will search to see if I can obtain this information from AiPi’s bank.

h. Although I would have all responsive communications and emails within my possession, I am working on trying to obtain access to conduct the same search as set forth in paragraphs 4(a)-4(f) of emails of Eric Lund and Ken Sheets.

5. The search set forth in paragraph 4 is currently underway, and I expect to complete it within one week.

6. Separately, myself and Eric Lund received an email from William Ramey on January 6, 2023 containing a document designated attorneys eyes only. AiPi has not used this document for any purpose outside of the lawsuit. AiPi agrees to be bound by all to be bound by all the terms of this Stipulated Protective Order. I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order

I declare and affirm under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2025


Eric Morehouse